

From: Maria Breen

Sent: Wednesday, January 09, 2019 12:48 AM

To: Comments

Subject: December 28, 2018 - Company-Run Stress Testing Requirements; Comment Request (RIN 3064-AE84)

I support the updating of the rules in regards to raising the minimum asset threshold from \$10 billion to \$250 billion and conducting stress tests “periodically” instead of “annually”, both in accordance with the amended section 165 of the Dodd-Frank Act. Based on the research provided and previous data, stress testing periodically rather than annually is appropriate for most FDIC insured banks. Today, stress tests are used to guarantee that banks internal risk management processes are working efficiently, banks management and boards of directors are aware and attentive of the risks they are facing and most importantly in regards to Dodd-Frank providing authorities with the risks and vulnerabilities within their institution. Although it is important for banks to be constantly aware of these things, doing a complete stress test every year is expensive and time consuming. Using historical data and biannual stress tests should be enough for the FDIC to be confident in the financial institutions it backs.